

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 17-11339 GLT
	:	
PHILLIP JOHN MCCUMBER AND	:	CHIEF JUDGE GREGORY L. TADDONIO
HEATHER LYNN WILKINSON,	:	
Debtors	:	CHAPTER 13
	:	
NATIONSTAR MORTGAGE, LLC,	:	RELATED TO CLAIM NO. 21
Movant,	:	
	:	
v.	:	
	:	
PHILLIP JOHN MCCUMBER AND	:	
HEATHER LYNN WILKINSON; and	:	
RONDA J. WINNECOUR, ESQUIRE,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE
FILED IN COMPLIANCE WITH THE LOCAL RULES

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin
Michael S. Jan Janin, Esquire
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Counsel for Debtors, Phillip John
McCumber and Heather Lynn Wilkinson

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PHILLIP JOHN MCCUMBER AND	:	
HEATHER LYNN WILKINSON; and	:	
RONDA J. WINNECOUR, ESQUIRE,	:	
CHAPTER 13 TRUSTEE,	:	
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**CERTIFICATE OF SERVICE OF DECLARATION REGARDING
NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on April 10, 2023.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification via the CM/ECF System.

- Office of the United States Trustee at ustpreregion03.pi.ecf@usdoj.gov
- Ronda J. Winnecour at cmecf@chapter13trusteewdpa.com
- Danielle Boyle-Ebersole for Creditor Rushmore Loan Management Services LLC at dboyle-ebersole@orlans.com
- Brian Nicholas for Creditor Union Home Mortgage Corp. at bnicholas@kmlawgroup.com
- Bradley Joseph Osborne for Creditor Rushmore Loan Management Services LLC at bosborne@hoflawgroup.com
- Nicholas R. Pagliari for Creditor Erie Community Credit Union at npagliari@mijb.com
- Karina Velter for Creditor Rushmore Loan Management Services LLC at kvelter@pincuslaw.com

EXECUTED ON: April 10, 2023

Respectfully submitted,

THE QUINN LAW FIRM

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